

1 DEAN S. KRISTY (CSB No. 157646)
dkristy@fenwick.com
 2 JENNIFER BRETAN (CSB No. 233475)
jbretan@fenwick.com
 3 CASEY O'NEILL (CSB No. 264406)
coneill@fenwick.com
 4 JOSHUA PARR (CSB No. 318549)
jparr@fenwick.com
 5 FENWICK & WEST LLP
 555 California Street, 12th Floor
 6 San Francisco, CA 94104
 Telephone: 415.875.2300
 7 Facsimile: 415.281.1350

8 FELIX LEE (CSB No. 197084)
flee@fenwick.com
 9 FENWICK & WEST LLP
 801 California Street
 10 Mountain View, CA 94041
 Telephone: 650.988.8500
 11 Facsimile: 650.938.5200

12 Attorneys for Defendants Temujin Labs Inc.
 (Delaware) and Temujin Labs Inc. (Cayman)
 13

14 UNITED STATES DISTRICT COURT
 15 NORTHERN DISTRICT OF CALIFORNIA
 16 SAN JOSE DIVISION

17 ARIEL ABITTAN,

18 Plaintiff,

19 v.

20 LILY CHAO (A/K/A TIFFANY CHEN, A/K/A
 21 YUTING CHEN), DAMIEN DING (A/K/A
 DAMIEN LEUNG, A/K/A TAO DING),
 22 TEMUJIN LABS INC. (A DELAWARE
 CORPORATION), AND TEMUJIN LABS INC.
 (A CAYMAN CORPORATION),
 23

24 Defendants,

25 and

26 EIAN LABS INC.,

27 Nominal Defendant.
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Case No.: 5:20-cv-09340-NC

**STIPULATION EXTENDING TIME
 TO RESPOND TO COMPLAINT**

(CIVIL L.R. 6-1(a))

Judge: Hon. Nathanael Cousins

Date Action Filed: December 24, 2020

1 Pursuant to Civil Local Rules 6-1 and 7-12, plaintiff Ariel Abittan (“Plaintiff”) and
2 defendants Temujin Labs Inc. (Delaware) (“Temujin Delaware”) and Temujin Labs Inc. (Cayman)
3 (“Temujin Cayman,” and together with Temujin Delaware, the “Stipulating Defendants”), by and
4 through their respective counsel, stipulate as follows:

5 WHEREAS, Plaintiff commenced this action on December 24, 2020;

6 WHEREAS, Plaintiff purports to have served the complaint in this action on the
7 Stipulating Defendants on January 29, 2021;

8 WHEREAS, Plaintiff and Stipulating Defendants previously agreed, pursuant to Civil
9 L.R. 6-1(a), to extend the Stipulating Defendants’ deadline to respond to the complaint to March
10 26, 2021 (ECF No. 21);

11 WHEREAS, Plaintiff and Stipulating Defendants are continuing to negotiate a separate
12 stipulation and proposed order that would include a voluntary dismissal of this action in favor of
13 Plaintiff re-filing Plaintiff’s claims in the California Superior Court for the County of Santa Clara,
14 Case No. 20-CV-372622, with Defendants reserving their right to challenge the legal or factual
15 adequacy of said claims, and are attempting to resolve issues in that negotiation as soon as
16 possible;

17 WHEREAS, absent voluntary dismissal of these claims, the Stipulating Defendants
18 anticipate filing motion(s) to dismiss in response to the complaint;

19 WHEREAS, Plaintiff and the Stipulating Defendants have met and conferred and have
20 agreed to further extend the deadline for the Stipulating Defendants to respond to the complaint,
21 whereby any response(s) are due April 6, 2021;

22 IT IS ACCORDINGLY STIPULATED, pursuant to Civil L.R. 6-1(a), by and between
23 Plaintiff and the Stipulating Defendants, that the time for Temujin Delaware and Temujin
24 Cayman to answer, move, or otherwise respond to the complaint is extended to April 6, 2021.

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1 Dated: March 25, 2021

ALTO LITIGATION, PC

2 By: /s/ Bahram Seyedin-Noor
Bahram Seyedin-Noor

3 4 Embarcadero Center, Suite 1400
4 San Francisco, California, 94111
Telephone: (415) 779-2586
5 Facsimile: (415) 306-8744

Attorneys for Plaintiff Ariel Abittan

6 Dated: March 25, 2021

FENWICK & WEST LLP

7 By: /s/ Jennifer Bretan
8 Jennifer Bretan

9 Attorneys for Defendants Temujin Labs Inc.
(Delaware) and Temujin Labs Inc. (Cayman)

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11 Pursuant to Civil L.R. 5-1(i)(3), all signatories concur in filing this stipulation.

12 Dated: March 25, 2021

By: /s/ Jennifer Bretan
Jennifer Bretan

FENWICK & WEST LLP
ATTORNEYS AT LAW